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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10

11 VINCENT A. DE LUNA,

12 Plaintiff,

13 vs.

14 SOUTHERN HILLS HOSPITAL AND
MEDICAL CENTER, a Sunrise Health
15 System Hospital,

16 Defendant.

CASE NO. 2:19-cv-02082-JAD-DJA

**STIPULATION AND
ORDER FOR EXTENSION OF TIME
FOR DEFENDANT TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

18 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff VICNENT A.
19 DE LUNA ("Plaintiff") and Defendant SOUTHERN HILLS MEDICAL CENTER, LLC
20 (incorrectly named as SOUTHERN HILLS HOSPITAL AND MEDICAL CENTER),
21 ("Defendant"), by and through their respective counsel of record Guinness Ohazuruike, Esq. of
22 GUINNESS LAW FIRM, and Bruce C. Young, Esq. of the law firm LEWIS BRISBOIS
23 BISGAARD & SMITH LLP, as follows:

24 Counsel for Defendant has only recently been retained to represent Defendant in this
25 matter. In light of the holiday season and counsel for Defendant being out of town, the parties
26 agree that an extension of time for Defendant to answer or otherwise respond to the Complaint is
27 necessary and appropriate.

28 / / /

1 Based on the date of service, Defendant's response to Plaintiff's Complaint is currently
2 due on January 2, 2020. In order to allow counsel for Defendant sufficient time to investigate the
3 facts and prepare an appropriate response to the Complaint, the Parties have agreed to stipulate to
4 extend the time for Defendant to respond to Plaintiff's Complaint up to and including January 17,
5 2020. This extension is not sought for any improper reason or for the purpose of delay.

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7 DATED this 27th day of December, 2019. DATED this 27th day of December, 2019.

8 LEWIS BRISBOIS BISGAARD & SMITH LLP GUINNESS LAW FIRM

9 By /s/ Bruce C. Young, Esq.

10 Bruce C. Young, Esq.
11 Paige S. Shreve, Esq.
12 6385 S. Rainbow Boulevard, Suite 600
13 Las Vegas, Nevada 89118
14 Attorneys for Defendant

By /s/ Guinness Ohazuruike, Esq.

Guinness Ohazuruike, Esq.
6845 W. Charleston Blvd., #A
Las Vegas, Nevada 89117
Attorney for Plaintiff

15 **ORDER**

16 Pursuant to the Stipulation of the Parties, and good cause appearing therefore:

17 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant's response to
18 Plaintiff's Complaint shall be filed on or before January 17, 2020.

19 DATED this 31st day of December, 2019.

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22 Daniel J. Albregts
23 United States Magistrate Judge